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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

NAVANA LOGISTICS LIMITED,

Plaintiff,

- against -

TW LOGISTICS, LLC, t/a TRANSWORLD LOGISTICS; SHLOMO GREENBERG; JDE ASSOCIATES LLC; ISRAEL DISCOUNT BANK OF NEW YORK,

Defendants.

Civil Action No. 15-cv-856 (PKC)

NOTICE OF MOTION

TAKE NOTICE, that upon the Declaration of David S.S. Hamilton, dated June 26, 2015, and the Second Amended Complaint annexed thereto, the accompanying Memorandum of Law and all pleadings and proceedings heretofore had herein, defendant Israel Discount Bank of New York ("IDB") shall make a motion before the Honorable P. Kevin Castel, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, for an order dismissing the Second Amended Complaint as to IDB pursuant to (i) Fed R. Civ. P. 8(a) and 12(b)(6) for failure to state a claim upon which relief can be granted; (ii) Fed R. Civ. P. 12(b) and 19(b) for failure to join a required party; (iii) Fed R. Civ. P. 12(c) and

17(a) as plaintiff Navana Logistics Limited is not a real party in interest and lacks standing to assert its purported claims against IDB upon which relief can be granted; and (iv) for such other and further relief as is just and proper.

TAKE FURTHER NOTICE, that opposing papers, if any, shall be served on or before July 10, 2015.

Dated: New York, New York June 26, 2015

ZEICHNER ELLMAN & KRAUSE LLP

By:

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